

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

_____)	
RICHARD SITCHA,)	
)	
Petitioner,)	
)	
v.)	Civil Action No.
)	
FREDERICK MACDONALD, et al.,)	04cv30090-MAP
)	
Respondents.)	
_____)	

MOTION FOR LEAVE TO FILE AFFIDAVIT

The respondents move for leave to file an affidavit of Anthony D. Collins, the petitioner's former counsel, in order to clarify events surrounding the petitioner's failure to appeal the Board of Immigration Appeals decision. The affidavit has been prepared and would be filed upon the granting of this motion.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: /s/Karen L. Goodwin
Karen L. Goodwin
Assistant U.S. Attorney
U.S. Attorney's Office
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CERTIFICATION

This is to certify that a copy of the foregoing was mailed this date, postage prepaid, to John P. McKenna, McKenna and Associates, P.C., 1357 Main Street, Suite 305, Springfield, MA 01103.

/s/Karen L. Goodwin
Karen L. Goodwin